

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,)	
)	
Plaintiff)	
)	
)	
v.)	AFFIRMATION
)	
)	
GLENN R. UNGER)	Indictment No. 12-CR-579
)	
)	
Defendant.)	

I, George E. Baird, Jr., being duly admitted as an attorney in the State and Northern District of New York, hereby state the following:

1. As a full time Assistant Federal Public Defender, I represented Glenn R. Unger in the above captioned case.
2. Following three days of proof, Mr. Unger was convicted by jury of all counts charged against him in Indictment .
3. Pursuant to Rules 29 and 33 of the Federal Rules of Criminal Procedure, Mr. Unger hereby moves for a Motion for a Judgement of Acquittal and for a New Trial.
4. Counsel is requesting a 35-day extension to provide supporting memorandum of law based on the time for obtaining the transcripts and assembling the record of the proceedings.

Wherefore, Mr. Unger hereby moves for relief pursuant to Rule 29 and Rule 33, of the Federal Rules of Criminal Procedure and requests an additional 35 days to file supporting documentation.

Dated: October 31, 2013

LISA A. PEEBLES
Federal Public Defender, NDNY

By: /s/ George E. Baird, Jr.
George Baird, Esq.
Assistant Federal Public Defender
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